



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/JEA/PAS
F. #2020R00508

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 28, 2020

By Hand Delivery and ECF

Amanda David, Esq. and Samuel Jacobson, Esq.
Federal Defenders of New York, Inc.
One Pierrepont Street, 16th Floor
Brooklyn, New York 11201

Re: United States v. Samantha Shader
Criminal Docket No. 20-202 (DLI)

Dear Defense Counsel:

Enclosed please find the government's fourth discovery production in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This supplements the disclosure of Rule 16 discovery produced to the defendant on July 15, 2020, July 24, 2020 and August 27, 2020. This production responds to your request for the videos in the NYPD Case File document labeled Index Sheet (Bates Number Shader_00046) outlined in the defendant's discovery letter dated October 14, 2020. The government also reiterates its prior request for reciprocal discovery from the defendant.

I. The Government's Discovery

A. Documents and Tangible Objects

1. Videos

Video of 60 Plaza Street	SHADER_000907
Video of 115 Eastern Parkway	SHADER_000908
Video of 198 Flatbush Avenue	SHADER_000909
Video of 201 Eastern Parkway	SHADER_000910

Video of 220 Flatbush Avenue	SHADER_000911
Video of 271 Flatbush Avenue	SHADER_000912
Video of 293 Flatbush Avenue	SHADER_000913
Video of 310 Flatbush Avenue	SHADER_000914
Video of 355 Flatbush Avenue	SHADER_000915
Video of 357 Flatbush Avenue	SHADER_000916
Video of 200 Eastern Parkway (5/29/2020 & 5/30/2020 Protest)	SHADER_000917
Video of 201 Eastern Parkway	SHADER_000918
Video of 253 Flatbush Avenue	SHADER_000919
Video of 271 Flatbush Avenue	SHADER_000920
Video of 355 Flatbush Avenue	SHADER_000921

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned attorneys.

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: /s/
Ian C. Richardson
Jonathan E. Algor
Phil Selden
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)